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Co-Lead/Liaison Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

**IN RE: BARD IVC FILTERS
 PRODUCTS LIABILITY LITIGATION**

MD No. 02641

**JOINT MOTION TO SEAL
 DOCUMENTS 379-1, 385-1,
 697-1 AND 697-2**

The parties jointly move for an order sealing Documents 379-1, 385-1, 697-1 and 697-2. Documents 379-1 and 385-1 were initially attached to Documents 380 and 386 in reference to the Lehmann Report briefing and Documents 697-1 and 697-2 were exhibits to Plaintiffs' Memorandum re Relevancy and Discovery of FDA Inspection and Warning Letter (Doc. 697). All Documents were previously ordered stricken (see Doc. 423 and Doc. 928) in order to preserve their confidential nature. However, despite the fact that the subject documents have been stricken, they remain accessible on PACER, the Court's docketing system. Upon discussion with the Clerk, it was learned that the most effective way to shield these confidential documents from public inspection is to seek to have them sealed.

Accordingly, for the reasons previously expressed in Plaintiffs' Unopposed Motion to Strike and Re-File Exhibits in Support of Plaintiffs' Opposition to Bard's Protective Order Regarding Report of John Lehmann, M.D. (Doc. 389) and Plaintiffs' Unopposed

1 Motion to Strike and Re-File Exhibits in Support of Plaintiffs' Memorandum Re:
2 Relevancy and Discoverability of FDA Inspection and Warning Letter and Recovery
3 Cone Removal System (Doc. 878), the parties respectfully request that the Court order
4 Documents 379-1, 385-1, 697-1 and 697-2 sealed.

5 DATED this 15th day of March, 2016.

6 GALLAGHER & KENNEDY, P.A.

SNELL & WILMER L.L.P.

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8 By: /s/ Robert W. Boatman

By: /s/ Matthew B. Lerner [with permission]

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19 **CERTIFICATE OF SERVICE**

20 I hereby certify that on this 15th day of March, 2016, I electronically transmitted the
21 attached document to the Clerk's Office using the CM/ECF System for filing and
22 transmittal of a Notice of Electronic Filing.

23 /s/ Nancy Jo Koenes

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